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Attorneys for Defendant
RUSSELL GOMEZ DZUL

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUSSELL GOMEZ DZUL,

Defendant.

Case No. 25-CR-00503-JLS

**DEFENDANT RUSSELL GOMEZ
DZUL'S UNOPPOSED EX PARTE
APPLICATION TO MODIFY
CONDITIONS OF RELEASE**

Defendant Russell Gomez Dzul, through counsel of record James S. Threatt, hereby seeks an order modifying his conditions of pre-trial release to suspend the requirement that he surrender his passport unless and until he is released from the custody of Immigration and Customs Enforcement (ICE).

The United States Probation and Pre-Trial Services Office and the government do not oppose this request.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: July 17, 2025

By /s/ James S. Threatt

James S. Threatt
Deputy Federal Public Defender
Attorney for Russell Gomez Dzul

DECLARATION OF JAMES S. THREATT

I, James S. Threatt, declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am licensed to practice law in the State of California and I am admitted to practice in this Court. I am appointed to represent Russell Gomez Dzul in this matter.

2. Mr. Gomez Dzul made his initial appearance on June 9, 2025. At that time, he was ordered detained on a complaint charging felony assault in violation of 18 U.S.C. § 111(a)(1). (Dkts. 1, 9.)

3. On June 18, 2025, the government elected to proceed by way of information in order to instead pursue a misdemeanor violation of 18 U.S.C. § 111(a)(1). (Dkt. 12.)

4. On June 27, 2025, Mr. Gomez Dzul was arraigned on the information. (Dkts. 14, 24.) He was also ordered released upon an affidavit of surety in the amount of \$5,000 signed by his sister-in-law Tanya Espindola Trujillo. (Dkts. 14, 22.)

5. When Mr. Gomez Dzul was released from BOP custody on June 27, he was immediately taken into custody by ICE on an immigration detainer. He is presently being held at the Adelanto ICE Processing Center.

6. The government still intends to proceed with the criminal charge contained in the Information.

7. One of the conditions of Mr. Gomez Dzul's release was that he surrender his Mexican passport. (Dkts. 14, 21.) However, I am concerned that if his passport is surrendered and Mr. Gomez Dzul is ultimately removed from the United States, it may be difficult to obtain his passport back from United States Probation and Pre-trial Services.

8. Accordingly, I ask that his conditions be modified so that he is not required to surrender his passport "unless and until he is released from ICE custody."

1 9. Mr. Gomez Dzul's surety, Tanya Espindola Trujillo, consents to this
2 modification. I have attached an executed consent to that effect.

3 10. On July 15, 2025, Assistant United States Attorney Thi Ho informed me
4 that the government does not oppose this request.

5 11. On July 16, 2025, Officer Fatima Vasquez informed me that United States
6 Probation and Pre-Trial Services does not oppose this request.

7
8 I declare under penalty of perjury under the laws of the United States of America
9 that the foregoing is true and correct.

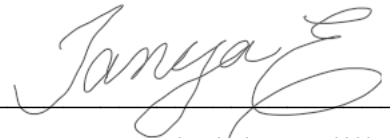
10 Executed on July 17, 2025, at Los Angeles, California.

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12 /s/ James S. Threatt
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Consent of Surety

The undersigned surety consents to the requested modification of Russell Gomez Dzul's pretrial release conditions, specifically that he will no longer be required to surrender his passport to Pre-Trial Services so long as he remains in the custody of Immigration and Customs Enforcement. Specifically, the "other conditions" field on page five of the bond shall read as follows: "Mr. Gomez Dzul was taken into custody by Immigration and Customs Enforcement ("ICE"). He will not be required to have his passport surrendered to Pre-Trial Services unless and until he is released from ICE custody."

Dated: July 16, 2025



Tanya Espindola Trujillo